

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

DINIKUE BROWN

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CRIMINAL NO. 05-40024-FDS

MOTION FOR A PRE-PLEA PRESENTENCE REPORT
(Assented to)

Now comes the defendant, DINIKUE BROWN, and moves this Honorable Court to order a Pre-Plea Presentence Report be prepared by the Probation Department.

As grounds for this request, defense counsel states that there are ambiguities in Mr. Brown's criminal history that might be explained after an investigation by the Probation Department. Further, a Pre-Plea Presentence Report is necessary to accurately assess the guideline criminal penalties and other sentencing options available to the Court pursuant to 18 U.S.C. § 3553 as Mr. Brown considers the alternatives to trial of the crime alleged in the above-captioned indictment.

The government joins with this request.

Respectfully submitted,
DINIKUE BROWN
By his attorney,

/s George F. Gormley
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Dated: August 11, 2005

